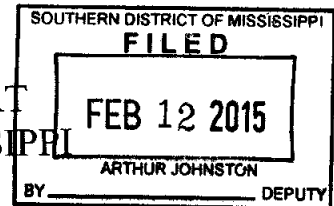


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

)
) PLAINTIFF

v.

)
) Civil Action No.1:14-cv-159-KS-MTP

DANIEL G. "DANNY" ABEL

)
) DEFENDANT
)
)

PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

NOW into court comes Plaintiff Douglas Handshoe, pursuant to Rules 15 and 20 of the Federal Rules of Civil Procedure, for leave to file an AMENDED COMPLAINT, a copy of which is attached the accompanying Memorandum of law in Support thereto. The new complaint maintains the counts and allegations against the original defendant from the original complaint, but adds additional defendants and causes of action that arise from the same set of facts and accounts for the significant factual and procedural developments that have occurred since the original complaint was filed as discussed more fully in the accompanying Memorandum of Law in support thereof.

WHEREFORE, Plaintiff prays the Court grants this Motion for leave to file an AMENDED COMPLAINT so that process may be issued.

Respectfully submitted this 12th day of February, 2015,

Plaintiff and sole owner of Slabbed New Media, LLC
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(228) 284-0004
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing Motion for leave to file an AMENDED COMPLAINT to the following via United States Mail:

Daniel G. Abel
C/O The Super 8 Motel / Desai Enterprises
2421 Clearview Parkway, Room 106
Metairie, LA 70001

Chris Yount
545 Terrace Street
Jefferson, LA 70121

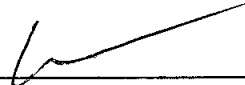
I, Douglas Handshoe, certify I have sent a true and correct copy of the foregoing Memorandum in Support of Motion for Leave to File Amended Complaint to the following via email:

Gita Bolt, Registered Agent and General Counsel
Loyola University New Orleans
6363 St Charles Avenue
Campus Box 009
New Orleans, LA 70118
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Ramona Fernandez
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Janey Lamar
3700 Earhart Blvd
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Respectfully submitted this 12th day of February, 2015,



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